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16/2/2024
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Dear Assessment Manager,

SUBMISSION: Draft 2024 Integrated System Plan

The Save the Mary River Coordinating Group Inc (STMRCG) is a community based group that continues to protect the health of the Mary River. It has a committee comprising of landholders in the Mary Valley region and demonstrated very substantial community support for its legitimacy and its actions. It has members from a wide range of professional backgrounds including expertise relevant to the issues required to be addressed in this submission.

We believe that the draft 2024 Integrated System Plan has many shortcomings. These include but not limited too:
1**. Does the proposed optimal development path help to deliver reliable, secure and affordable electricity through the NEM, and reduce Australia's greenhouse gas emissions? If yes, what gives you that confidence? If not, what should be considered further, and why?**

No the proposed optimal development path does not give confidence for deliver of reliable, secure and affordable electricity through the NEM, and reduce Australia's greenhouse gas emissions. It assumes that 2 Pumped Hydro Energy Storage projects in Qld are going ahead with no options to consider that they will not be approved. It assumes social licence for transmission lines which clearly it does not have with so many action groups opposing.

In particular, the Borumba Pumped Hydro Energy Storage project has currently no federal environmental approvals for the exploratory works or main works. Both have triggered the Environment Protection and Biodiversity Conservation Act as controlled actions and the main works has 5 controlling provisions to be assessed. The environmental, social and economic risks are high. There are other options that are cheaper, able to be constructed quicker and less destructive to the environment.

Energy Experts have publicly questioned the Borumba proposal, saying that Battery Energy Storage System (BESS) would be available quicker, more efficient, and less risky for energy storage.

Why eight-hour batteries are smarter choice than pumped hydro for Queensland | RenewEconomy

Queensland's giant Borumba storage plan will cost double early estimates: Batteries are cheaper | RenewEconomy

Questions are being raised over Queensland's pumped hydro plans. What is it and are there alternative options? - ABC News
Of note from the above link, Professor Bartlett said

"[Australian Energy Market Operator] AEMO's own report shows that 8-hour batteries are about half the cost of an 8-hour pump storage scheme. "Pumped storage is expensive because of the civil engineering, the concrete, the steel, the labour … and while pumped storage has getting dearer, batteries are getting cheaper."

The proponent, Qld Hydro has identified there will be impacts that cannot be mitigated or has put forward unproven mitigation measures, and is already trying to delay commitment to offsets from the Exploratory Works Referral which is totally unacceptable. Relying on "Developing an Offset Policy" as a mitigation measure is also unacceptable. This project and its associated transmission lines presents environmental risks to the MNES in the Mary River catchment and internationally significant Ramsar of the Great Sandy Strait and World Heritage Great Barrier Reef. Recovery plans for many species depends protecting species habitats, on improving water quality, not risking degrading it with dispersive soils, acid runoff and heavy metals.

In addition, methane emissions from dams around the world are well documented and the existing Borumba Dam is listed as having high emissions. This draft has not taken into account methane emissions that would occur over the life of the PHES and does not provide evidence that the pathway has considered this need to reduce Australia's greenhouse gas emissions. For more details about dam emissions Greenhouse Gas Emissions from Dams FAQ | International Rivers

It assumes vast kilometers of transmission lines to be built and maintained. There is ample evidence that this is a very risky with lack of social licence from regional communities and easily prone to damage by storms and bushfires.

2. Does the proposed timing and treatment of actionable projects support a reliable, secure and affordable NEM? If yes, what gives you that confidence? If not, what should be considered further, and why?

No the proposed timing and treatment of actionable projects does not support a reliable, secure and affordable NEM.
If the SNOWY 2 project is an example of PHES projects this draft plan is highly risky in timing estimates.
Dam walls can be built but does not guarantee the dams will fill in time.
Approvals for transmission lines across free hold land have no guarantee of timing particularly with lack of social licence.

3. Does the Draft 2024 ISP accurately reflect consumers' risk preferences? If yes, how so? If not, how else could consumers' risk preferences be included and what risks do you think are important to consider?

No …the Draft 2024 ISP does not accurately reflect consumers' risk preferences. Customers are looking for cheaper energy not escalating costs that are occurring.
Recommend to go back to the drawing board and find a more equitable and resilient way forward involving Australias not overseas corporations. Capture energy and store it where it is to be used.. in the cities and industrial areas.
We recommend that the NEM must solve some basic problems with the power grid (eg upgrading the grid to be able to access and store more from roof top solar) and national energy market, and take more opportunities to use the take up of roof top solar and pay people a much higher feed in price back into the grid. Giving 5c/kWh to a customer providing energy from their roof top solar and then charging 25c/kWh to access from the grid is not encouraging customers to be more involved in the renewable energy solution.

Capturing the energy via roof top solar where it is to be used is far more efficient, brings revenue to ordinary Australians and avoids transmission losses and the huge footprint of environmental destruction for industrial solar and wind areas in "REZ"s by overseas corporations (1.8 million ha of wind and 40,000 ha for solar by 2035 being proposed along with associated transmission of 10,000km!!!).

Invest more in advancing battery technology, energy efficient appliances, making our country more resilient rather than the current roadmap which makes us more vulnerable to an unreliable grid, blackouts, increasing energy costs to pay for this notion that the regional areas must produce the cities power.

Recommend to go back to the drawing board and find a more equitable and resilient way forward involving Australias, not overseas corporations. Capture energy and store it where it is to be used.. in the cities and industrial areas. Some good suggestions are in this article https://reneweconomy.com.au/households-need-a-fair-go-on-the-grid-for-solar-batteries-and-evs/

4. Do you have advice about how social licence can be further considered in the ISP, or advice on how to quantify the potential impact of social licence through social licence sensitivity analysis?

The whole concept of Renewable Energy Zones, transmission lines and PHES projects have huge limitations and does not have social licence as evidenced by so many action groups against ISP projects. These projects potentially are going to create unacceptable cumulative landscape changes, in regional communities, have enormous social and environmental impacts, cost $billions, produce a high risk, high cost pathway to try to produce ??? gigawatts of power.

Proposing renewable energy zones are already starting to affect land prices (30-50% reduction if close to these solar or wind industrial projects or their associated transmission lines), has created uncertainty, and is becoming very divisive in regional communities. It is being seen as un-democratic, non-consultative and rapidly losing support from regional communities. The solar and wind industrial areas have cumulative impacts on the landscape, nature, biodiversity and lacks strategic assessment in their placement.

There is a need to involve customers with roof top solar more in the solution for energy capture and encourage more battery storage at point of energy capture in the cities, instead of proposing hectares of destruction for industrial solar and wind turbines, and thousands of kilometers of transmission lines be constructed in regional areas.

5. Do you have any feedback on the Addendum to the 2023 Inputs Assumptions and Scenarios Report?

Assuming that Borumba PHES and associated transmission lines are going ahead with no environmental approvals yet and having no alternative options if it is stopped, does not reflect well for building trust with communities that this is an open and transparent processes occurring in the planning of the draft 2024 ISP. Insufficient information about how this will reduce emissions. Dams are huge emitters of methane.

We request the opportunity to provide further submissions if necessary. If you wish to discuss any of the issues raised in this submission, please contact me on mb 0411443589 or email glendap5@gmail.com.

Yours Sincerely,

G E. Pickersgill

Glenda Pickersgill
President, Save the Mary River Coordinating Group Inc.